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Attorneys for Defendant
WALMART INC.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KORTNEY OLSON,
Plaintiff,
v.
WALMART STORES INC. AND
WONDER NATION,
Defendants.

Case No. 2:20-cv-00152-GMN-NJK
**UNOPPOSED MOTION TO
EXTEND TIME TO RESPOND TO
INITIAL COMPLAINT**

(Third Request)

Complaint served: February 7, 2020
Current response date: April 29, 2020
New response date: May 29, 2020

Judge: Gloria M. Navarro
Magistrate Judge: Nancy J. Koppe

1 According to Local Rule IA 6-1 of the United States District Court for the
2 District of Nevada, Walmart Inc., owner of the subsidiary that owns the trademark
3 Wonder Nation (“Defendant”), with Plaintiff’s consent, respectively requests that
4 the Court extend Defendant’s time to respond to Plaintiff’s Complaint. This is
5 Defendant’s third request.

6 **MEMORANDUM OF POINTS AND AUTHORITIES**

7 On January 22, 2020, Plaintiff filed a Complaint with the United States
8 District Court for the District of Nevada. On February 7, 2020, Plaintiff caused
9 copies of the Summons and Complaint to be delivered and served on Defendant.

10 Plaintiff, who originally filed her complaint pro se, retained counsel and
11 granted Defendant two 30-day extensions of time, which the Court granted,
12 pursuant to which Defendant had until April 29, 2020 to answer, move to dismiss or
13 strike, or otherwise respond to Plaintiff’s Complaint.

14 Plaintiff and Defendant have been in settlement discussions, which are
15 currently ongoing.

16 In an effort to resolve this matter and continue their discussions, Plaintiff and
17 Defendant have agreed to extend Defendant’s response deadline by an additional
18 30-days from Defendant’s current response date, pursuant to which Defendant shall
19 have until May 29, 2020 to answer, move to dismiss or strike, or otherwise respond
20 to Plaintiff’s Complaint. Plaintiff’s counsel is not yet admitted in Nevada, nor has
21 he retained the services of local counsel in this jurisdiction.

22 The Parties’ settlement negotiations and interests in resolving this dispute
23 serve as just cause for the filing of this request. Defendant reserves the right to file
24 an answer, motion or dismiss or strike, or other responsive pleading prior to its May
25 29, 2020 deadline.

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1 Therefore, Defendant respectfully moves this Court for an extension until
2 and including **May 29, 2020** to answer, move to dismiss or strike, or otherwise
3 respond to the Complaint filed in this matter.

4
5 Dated: April 27, 2020

**ROPERS MAJESKI KOHN &
BENTLEY PC AND ARENT FOX LLP**

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8 By: /s/ Allan E. Anderson

9 **STEPHEN J. ERIGERO (SBN 11562)**
10 **TIMOTHY J. LEPORE (SBN 13908)**

11 **ALLAN E. ANDERSON**
12 **DANIELLE W. BULGER**
13 **JAKE GILBERT**

14 **Attorneys for Defendant**
15 **WALMART INC.**

16 **IT IS SO ORDERED.**

17 
18 **Nancy J. Koppe**
19 **United States Magistrate Judge**

20 Dated: April 28, 2020